

From: Smith, Richard [mailto:Richard.Smith@sdcounty.ca.gov]
Sent: Monday, December 13, 2004 10:36 AM
To: CalEPA Environmental Justice Program
Subject: Phase 1 activities in Cal/EPA's Environmental Justice Action Plan

I have a couple of comments on the Phase 1 activities in Cal/EPA's Environmental Justice Action Plan as follows:

Section 2.1 Developing Guidance on Precautionary Approaches

In addition to the tasks listed in Section 2.1, the Interagency Working Group on Environmental Justice (IWG on EJ) should also assess when precautionary approaches are needed. For example, the guidance might state that a precautionary approach is needed when there is conflicting credible scientific evidence.

Section 2.2 Develop Guidance on Cumulative Impacts

The IWG on EJ should also develop guidance on how the results of a multi-media cumulative impacts assessment should be used in the decision making process (i.e., what is the recommended health risk threshold of acceptability for a multi-media impacts analysis).

Section 3.1 ChERRP Pilot Projects

The IWG on EJ should identify the acceptable target health risk level for projects. This will help in identifying potential pilot projects (i.e., what potential projects exceed this target risk threshold and merit risk reduction efforts) and determining when a project is successful (i.e., when the risk has been reduced to this target risk threshold or less).

If you have any questions, please call me at (858) 650-4500.

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